



Privacy Notice – Ysgol Penrhyn Dewi VA

This privacy notice covers how Ysgol Penrhyn Dewi VA, (as a Data Controller) will collect, use and share your personal data for the purposes of providing educational provision in our 3-16 VA setting.

Why we need your information (purpose of processing)?

We collect and use your personal information so that we can provide a safe, supportive and effective learning environment.

The information that you provide will be processed according to the UK General Data Protection Regulation and the Data Protection Act 2018, Local Government Act 2000 (Section 2), The Government of Wales Act 2006 (Section 60), Learning and Skills Act 2000 (Sections 33, 40, 138 & 140), Education Act 2004, SEN Code of Practice for Wales, Employment and Training Act 1973 (Sections 8, 9 & 10), The Education (Information about Individual Pupils (Wales) Regulations 2007, Frameworks such as Youth Engagement and Progression Framework, Special Educational Needs and Disability Act 2001, Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), Management of Health and Safety at Work Regulations 1999.

We will also make any disclosures required by law and we may also share this information with other bodies responsible for detecting/preventing fraud/crime or auditing/administering public funds to ensure money is targeted and spent in the most appropriate and cost-effective way. In order to achieve this, information will be shared with our Audit Service within Pembrokeshire County Council and with The Auditor General for Wales ([Audit Wales Privacy and Cookie Policy](#)).

We will not make any disclosures to third parties for marketing purposes.

Your data will be secure and confidential at all times, and we will only collect the personal information that is required to provide you with our service.

What personal data is being collected?

The categories of personal data being collected are:

Pupil and ALN Data: Names, date of birth, UPN number, address, parent/carer contact details, sibling details if in same school, ethnicity, traveller or service child, first language, health and medical records, allergies, dietary requirements, ALN information.

Staff Records: Contact details, next of Kin, date of birth, national insurance number, DBS details, qualifications.

School Governors: HWB email addresses, names and telephone numbers.

Images: Photos, videos potentially with sound.

Visitor Information / Sign In: Name, photograph, company, car registration.

Supply Staff: Name, contact details and their DBS check.

Accident and Incident Reporting: Date, time and place of the incident, name, age (and class) of the injured or ill person, name of other pupils involved, contact details, details of the injury or illness, details of any first aid provided, name and signature of the first aider or person dealing with the incident, whether the parent was contacted.

CCTV: Images/video.

Business Continuity: Name, contact details – telephone numbers and address.

What is our lawful basis for processing your personal data?

The UK General Data Protection Regulations (UK GDPR) requires specific conditions to be met to ensure that the processing of your personal data is lawful. These relevant conditions are below:

- Article 6 (1)(b) Contract: the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- Article 6 (1)(e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- Article 6 (1)(f) Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

Some types of personal data are more sensitive than others and need more protection. This is classed as 'special category data' and could include information about your racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership and the processing of genetic or biometric data, health and sex life and sexual orientation.

We process this type of special category data as it is necessary for reasons of:

- Article 9 (2)(g) Substantial public interest
 - Safeguarding of children and individuals at risk
 - Statutory and government purpose.

Who will we share your information with?

We may need to share your personal data with internal departments of the Council, other organisations and third parties, this will include:

- **Pupil Records, ALN and Register:** Careers Wales, School Nursing Service - Health, Speech and Language Therapy Service, Local Authority inc. Leisure Centres, Social Services, Team Around the Pupil Parent and Setting (TAPPAS), Youth Engagement and Progression Framework, Examination bodies, ESYTN, Really Pro LTD, Learning Records Service, to create a Unique Learner Number (ULN), Welsh Government, social services (submitted via MARF), School Management
- **Information System (SIMS);** Edukey inc. School Robins, Literacy Assessment Online, Class Charts, Safeguard my School, Provision Map; Welsh Assembly Government inc. Plasc, Designed to Smile, Kerbcraft, Hwb, Flying Start, Data Exchange Wales Initiative (DEWI), FACE project ; National Health Service (NHS); External Advisory Teachers; Evolve (school visits); Primary and Secondary Schools (transition purposes); Haven System (school meals); Taith360; Wonde; Class Dojo; IDL Literacy; Power BI; Urdd; LexiaUK; Big Maths; Oxford Reading Tree; Carousel; Purple Mash; Mathletics; All Wales Reading Test (AWRT); GL Assessment; Youth Support Services; Colleges of Further Education and Work Based Trainers; Learning Curve; Police; Maths Pad; Time Tables Rock Stars; Mathletics; Reading Eggs; Wigit; Adobe Creative Cloud; Wordwall; InVentry, SHRN, School Counselling service, Dyfed Powys police, Post 16 educational providers.
- **Staff Records:** Local Authority HR, Hwb, School Management Information System (SIMS); Mutual Absence Scheme; WJEC; Education Workforce Council (EWC); Police; Governors; Other bodies for reference purposes; InVentry, Estyn; School Newsletter
- **Images:** Hwb; Social Media, School Website; Class Dojo, School Newsletter, School Social Media platforms – Facebook, Instagram, School Prospectus, School iPads, School Management Information System (SIMS), Local and National Press.
- Visitor Sign In: InVentry
- **Supply Staff:** Hoop Education, Teacher Active; New Directions, Police, Local Authority.
- **Accident and Incident Reporting:** Local Authority Health and Safety department (Evotix Accident Reporting Software).

- **CCTV:** Police.
- **Business Continuity Plan:** School Management Information System (SIMS); PCC Education Access and Compliance Team.
- **Transaction and associated data:** Tucasi Scopay Automated Payment System

We use data processors (third parties) who provide services to us in terms of IT provision and disaster recovery. We have contracts in place with these data processors and they cannot do anything with your personal information unless we have instructed them to do it. They will hold your data securely and your personal information will only be shared in accordance with UK GDPR. When it is necessary for your personal information to be transferred outside of the UK as part of these contracts, this will only be done in accordance with the UK GDPR.

Ysgol Penrhyn Dewi VA has a duty to protect the public funds it manages. Therefore, the information that you have provided to us may be used for the prevention and detection of fraud and for auditing purposes both internally and externally.

The personal information we have collected from you will be shared with fraud prevention agencies who will use it to prevent fraud and money-laundering and to verify your identity. If fraud is detected, you could be refused certain services, finance, or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be found by visiting [CIFAS](#).

How long do we keep hold of your information?

Ysgol Penrhyn Dewi VA will only keep your information for as long as is necessary, we will retain the information provided to us for:

Pupil and ALN Data: All records are kept until they are 30.

Staff Records: Automatic process that when they leave they are removed from SIMS.

School Governors: Governors SLA - PCC manages appointment and personnel information.

Correspondence, attendance, monitoring visits, AGM 6 years. Annual Reports, Reports to Governors meeting 10 years.

Images: Regarding photos, electronic versions are removed after 13 years. Some photos may be used for more extended periods these may be on the website or displayed on the walls. For example, we keep photos of Alumni, School Productions etc. These are kept indefinitely unless removal is requested.

Class Dojo retention - 'We only keep a child's personal information for as long as the account is active, unless we are required by law or the child's school (for Student Accounts) to retain it, need it to enforce our policies or to ensure the security of our community. We automatically delete their Feedback Points given in the classroom after a year, and (2) we delete Students' Accounts if they're inactive for more than twelve months. Please note that this does not include certain content uploaded by the teacher, parent, or pupil to the portfolio that may be considered an "education record" under FERPA or other state student privacy laws as we are required to retain these at the direction of the school. ClassDojo will also delete inactive Outside School Child Accounts.'

Visitor Information / Sign In: 3 years for paper and electronic.

Supply Staff: 6 years.

Accident and Incident Reporting: 3 years after the accident report book is completed. Regarding the electronic versions on Evotix the PCC Health and Safety department would manage this process.

CCTV: 30 days.

Business Continuity: Until Employee leaves post.

Transaction and associated data: 7 calendar years.

Your information will be securely disposed of once it is no longer required.

Your Rights:

Under the UK General Data Protection Regulation and Data Protection Act 2018, you have rights as an individual including:

- The right to **Rectification** – you have the right to ask to have your information corrected.
- The right to **Restrict** processing may apply – you may request that we stop processing your personal data however, this may delay or prevent us delivering a service to you. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to **Object** – this is not an absolute right and will depend on the reason for processing your personal information.
- The right to **Erasure** - you may request that we erase your personal data however, this may delay or prevent us delivering a service or continuing to deliver a service. We will seek to comply with your request but may be required to hold or process information to comply with our legal duties.
- The right to not be subject to **Automated decision making and profiling**.
- The right of **Access** – you have the right to ask us for copies of your personal data. To make a request, please contact:
Access to Records
Pembrokeshire County Council
County Hall
Haverfordwest
SA61 1TP

Email: accesstorecords@pembrokeshire.gov.uk

Telephone: 01437 764551

Complaints or Queries

Ysgol Penrhyn Dewi VA endeavours to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this seriously. We encourage people to bring to our attention if they believe that our collection or use of information is unfair, misleading or inappropriate.

This privacy notice does not provide exhaustive detail of all aspects of our collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to the address below:

Data Protection Officer
Ysgol Penrhyn Dewi VA
Dewi Campus,
Millard Park,
St Davids
SA62 6QH

Email: admin.penrhindewi@pembrokeshire.gov.uk

Telephone: 01437 809200

If you want to make a complaint about the way we have processed your personal information, you can contact the Information Commissioner's Office as the statutory body which oversees data protection law:

Information Commissioner's Office – Wales
2nd Floor, Churchill House
Churchill Way
Cardiff
CF10 2HH

Email: wales@ico.org.uk

Telephone: 0330 414 6421

Our Contact Details as Data Controller are:

Ysgol Penrhyn Dewi VA
Dewi Campus,
Millard Park,
St Davids
SA62 6QH

Email: admin.penrhindewi@pembrokeshire.gov.uk

Telephone: 01437 809200

Our Data Protection Officer's information is detailed above in the Complaints and Queries section.

Changes to this privacy notice

We keep our privacy notice under regular review.